

May 27, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

RE: WT Docket No. 96-86; 7th NPRM Comments

Dear Ms. Dortch:

Comments Of William De Camp, P.E., In Response To Seventh Notice Of Proposed Rule Making for WT Docket No. 96-86:

I am a California citizen with established participatory public safety agency and affiliation experience, and am responding on my own behalf in offering the following. I hereby respectfully submit my comments in response to the Seventh Notice of Proposed Rule Making for WT Docket No. 96-86, FCC 05-9, released January 7, 2005. The Notice proposes, among other things, to adopt a single, proprietary standard for 700 MHz wideband data spectrum that would be mandatory for all mobile and portable radios operating on wideband interoperability channels. For my comments on this issue in particular, I offer the following:

Introduction:

In 2000, the Commission adopted Project 25 Phase I as the standard for the 700 MHz narrowband interoperability channels; however, it noted that additional work was needed on a wideband standard, and that it would be premature to adopt any wideband interoperability standard absent an NCC recommendation.

I believe mitigating circumstances *continue to* render adoption of a wideband standard premature at this juncture. Here's why.

Mitigating Circumstances Rendering Adoption Of A Wideband Standard

Premature:

I applaud the Commission's foresight in establishing the National Coordination Committee (NCC) – a body established by the Commission for the purposes of addressing and advising it on the operational and technical parameters for use of the 700 MHz band.

Indeed, from its first report to the Commission in August 1999 through its final report in July 2003, the NCC performed its commission in a timely fashion, to the best of its abilities, and in conjunction with openly soliciting and giving due consideration to the myriad inputs from the public safety community.

Throughout that same period, wireless technological prowess increased significantly, but the public safety user community's awareness of how to exploit those technological advances lagged behind, usurped by unprecedented budget challenges and a heightened emphasis on national security. Also, use of the wideband channels remained abstract; that is, the 700 MHz spectrum was unavailable to public safety where most needed, and wideband products were not available.

The public safety user community's understanding of the value and uses of high speed data has accelerated since July 2003 primarily due to the Commission's allocation of the 4,940 to 4,990 MHz spectrum to public safety in mid 2003, and also as a result of the Department of Homeland Security SAFECOM Program's efforts in educating the public safety user communities as exemplified, for example, by its March 2004 *"Statement of Requirements for Public Safety Wireless Communications and Interoperability"* document. Deployable 4.9 GHz products began appearing in mid 2004, and the number of solutions from multiple vendors is increasing significantly with time. – all within a period of less than two years of the Commission's allocation!

Unfortunately, efforts towards ensuring a date-certain for 700 MHz spectrum availability have not yet borne results; neither has a sense of wideband product availability and cost progressed markedly since 2003.

In view of the emergent state of both the technologies supporting wideband data and the subject 700 MHz spectrum these technologies will employ, I urge the Commission to delay a ruling on imposing a wideband interoperability standard until the date broadcasters are obliged to vacate the 700 MHz spectrum. This will allow sufficient time for public safety users to evolve into this new high-speed data realm via experience they will accrue after deploying and employing 4.9 GHz technologies and applications. It will also allow them adequate time to develop a sense of the need for high-speed data interoperability and the various methods of achieving it.

Counter arguments may advise that postponing a decision will unnecessarily delay the deployment of wideband technologies and systems. I suggest that going forward with the proposed adoption now may render equally objectionable, but longer-lasting, virtually irreversible results.

Thank you in advance for your consideration of my comments.

Sincerely,

A handwritten signature in black ink that reads "Wm De Camp". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

William De Camp, P.E.
6225 Grass Valley Highway
Auburn, CA 95602
william.decamp@dgs.ca.gov